## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	) Chapter 11	
	)	
APEX LINEN SERVICE LLC, et al., <sup>1</sup>	) Case No. 20-11774 (LSS	3)
	)	
Debtors.	) (Jointly Administered)	

## NOTICE OF SECOND AMENDED<sup>2</sup>AGENDA FOR CONTINUATION OF FIRST DAY HEARING SCHEDULED FOR JULY 22, 2020 AT 11:00 A.M. (EDT)

THIS HEARING WILL BE HELD TELEPHONICALLY AND BY VIDEO. ALL PARTIES WISHING TO APPEAR MUST DO SO TELEPHONICALLY BY CONTACTING COURTCALL, LLC AT 866-582-6878 NO LATER THAN JULY 22, 2020 AT 8:30 A.M. (ET) TO SIGN UP. ADDITIONALLY, ANYONE WISHING TO APPEAR BY ZOOM IS INVITED TO USE THE LINK BELOW. ALL PARTIES THAT WILL BE ARGUING OR TESTIFYING MUST APPEAR BY ZOOM AND COURTCALL. PARTICIPANTS ON COURTCALL SHOULD DIAL INTO THE CALL NOT LATER THAN 10 MINUTES PRIOR TO THE START OF THE SCHEDULED HEARING TO INSURE A PROPER CONNECTION

# PLEASE NOTE THAT THE MICROPHONES ON THE ZOOM MEETING WILL BE MUTED AND THE ONLY AUDIO WILL BE THROUGH COURTCALL.

Topic: Apex Linen Service LLC 20-11774 (LSS)

Time: Jul 22, 2020 11:00 AM Eastern Time (US and Canada)

Join ZoomGov Meeting

https://debuscourts.zoomgov.com/j/1607005201

Meeting ID: 160 700 5201

Password: 276602

Join by SIP

1607005201@sip.zoomgov.com

<sup>1</sup>The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable are: Apex Linen Service LLC (9075), Highland Apex Holdings LLC (0537), Highland Avenue Capital Partners LLC (2825), Highland Apex GP LLC (9246), and Highland Apex Management LLC (5476). The location of the Debtors' corporate headquarters, and the business address for Apex Linen Service LLC is 6375 S. Arville Street, Las Vegas, NV 89118. The business address for all other Debtors is 205 Pier Avenue, Suite 102, Hermosa Beach, CA 90254.

<sup>&</sup>lt;sup>2</sup> Amended agenda items appear in bold and italics.

#### **MATTERS GOING FORWARD:**

1. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Claims of Critical Vendors and (II) Granting Related Relief [Docket No. 11; Filed 7/8/2020]

## Related Documents:

- A. Declaration of Christopher Bryan in Support of Debtors' First Day Motions [Docket No. 25; Filed 7/9/2020]
- B. Certification of Counsel with respect to Interim Order (I) Authorizing Debtors to Pay Certain Prepetition Claims of Critical Vendors; (II) Scheduling Further Interim Hearing; and (III) Granting Related Relief [Docket No. 57; Filed 7/16/2020]
- C. Interim Order (I) Authorizing Debtors to Pay Certain Prepetition Claims of Critical Vendors; (II) Scheduling Further Interim Hearing; and (III) Granting Related Relief [Docket No. 71; Entered 7/20/2020]
- D. Breakwater Management LP's Opposition to Debtors': (1) Emergency Motion Authorizing Debtors to Obtain Postpetition Financing, (2) Second Supplement to Emergency Motion Authorizing Use of Cash Collateral, and (3) Motion to Pay Critical Trade Vendor Claims [Docket No. 80; Filed 7/21/2020]
- E. Debtors' Reply to Breakwater Management LP's Opposition to Debtors': (1) Emergency Motion Authorizing Debtors to Obtain Postpetition Financing, (2) Second Supplement to Emergency Motion Authorizing Use of Cash Collateral, and (3) Motion to Pay Critical Trade Vendor Claims [Docket No. 85; Filed 7/22/2020]

**Status:** This matter is going forward with respect to further interim relief.

2. Emergency Motion Pursuant to Sections 361 and 363 of the Bankruptcy Code and Bankruptcy Rule 4001 for Interim and Final Orders: (1) Authorizing Use of Cash Collateral; (2) Scheduling Further Interim Hearing; and (3) for Related Relief [Docket No. 18; Filed 7/9/2020]

Objection Deadline to Interim Relief Requested: July 21, 2020 at 3:00 p.m. EDT

### Related Documents:

A. Declaration of Christopher Bryan in Support of Debtors' First Day Motions [Docket No. 25; Filed 7/9/2020]

- B. Stipulated Interim Order Authorizing Use of Cash Collateral and Scheduling Further Interim Hearing [Docket No. 30; Entered 7/10/2020]
- C. Supplement to Emergency Motion Pursuant to Sections 361 and 363 of the Bankruptcy Code and Bankruptcy Rule 4001 for Interim and Final Orders: (1) Authorizing Use of Cash Collateral; (2) Scheduling Further Interim Hearing; and (3) for Related Relief [Docket No. 36; Filed 7/14/2020]
- D. Debtors' Witness List and List of Exhibits for Hearing on Cash Collateral Motions [Docket No. 41; Filed 7/14/2020]
- E. Second Interim Order (A) Authorizing Interim Use of Cash Collateral; (B) Granting Adequate Protection for Use of Prepetition Collateral; and (C) Scheduling Further Hearing [Docket No. 68; Entered 7/17/2020]
- F. Second Supplement to Emergency Motion Pursuant to Sections 361 and 363 of the Bankruptcy Code and Bankruptcy Rule 4001 for Interim and Final Orders: (1) Authorizing Use of Cash Collateral; (2) Scheduling Further Interim Hearing; and (3) for Related Relief [Docket No. 74; Filed 7/20/2020]
- G. Notice of Filing of Exhibit A and Revised Exhibit B to Debtors' Emergency Motion for Interim and Final Orders: (I) Authorizing the Debtors to Obtain Postpetition Financing; (II) Scheduling a Final Hearing; (III) Approving Notice Procedures; and (IV) Granting Further Relief [Docket No. 77; Filed 7/20/2020]
- H. Breakwater Management LP's Opposition to Debtors': (1) Emergency Motion Authorizing Debtors to Obtain Postpetition Financing, (2) Second Supplement to Emergency Motion Authorizing Use of Cash Collateral, and (3) Motion to Pay Critical Trade Vendor Claims [Docket No. 80; Filed 7/21/2020]
- I. Debtors' Reply to Breakwater Management LP's Opposition to Debtors': (1) Emergency Motion Authorizing Debtors to Obtain Postpetition Financing, (2) Second Supplement to Emergency Motion Authorizing Use of Cash Collateral, and (3) Motion to Pay Critical Trade Vendor Claims [Docket No. 85; Filed 7/22/2020]

**Status:** This matter is going forward.

3. Debtors' Emergency Motion for Interim and Final Orders: (I) Authorizing the Debtors to Obtain Postpetition Financing; (II) Scheduling a Final Hearing; (III) Approving Notice Procedures; and (IV) Granting Further Relief [Docket No. 75; Filed 7/20/2020]

Objection Deadline to Interim Relief Requested: July 21, 2020 at 3:00 p.m. EDT

#### Related Documents:

- A. Declaration of Christopher Bryan in Support of Debtors' First Day Motions [Docket No. 25; Filed 7/9/2020]
- B. Notice of Filing of Revised Exhibit 1 to Proposed Third Interim Order (A) Authorizing Interim Use of Cash Collateral, (B) Granting Adequate Protection for Use of Prepetition Collateral, and (C) Scheduling Final Hearing [Docket No. 78; Filed 7/20/2020]
- C. Breakwater Management LP's Opposition to Debtors': (1) Emergency Motion Authorizing Debtors to Obtain Postpetition Financing, (2) Second Supplement to Emergency Motion Authorizing Use of Cash Collateral, and (3) Motion to Pay Critical Trade Vendor Claims [Docket No. 80; Filed 7/21/2020]
- D. Debtors' Reply to Breakwater Management LP's Opposition to Debtors': (1) Emergency Motion Authorizing Debtors to Obtain Postpetition Financing, (2) Second Supplement to Emergency Motion Authorizing Use of Cash Collateral, and (3) Motion to Pay Critical Trade Vendor Claims [Docket No. 85; Filed 7/22/2020]

**Status:** This matter is going forward.

Respectfully submitted,

Dated: July 22, 2020

### GOLDSTEIN & MCCLINTOCK, LLLP

By: /s/ Maria Aprile Sawczuk
Maria Aprile Sawczuk, Esq. (Bar ID 3320)
501 Silverside Road, Suite 65
Wilmington, DE 19809
Telephone: (302) 444-6710
Facsimile: (302) 444-6709
marias@goldmclaw.com

-and-

Harley J. Goldstein, Esq. (admitted pro hac vice) Jeffrey C. Dan, Esq. (admitted pro hac vice) 111 W. Washington Street, Suite 1221 Chicago, IL 60602

Telephone: (312) 337-7700 Facsimile: (312) 277-2310 harleyg@goldmclaw.com jeffd@goldmclaw.com

Proposed attorneys for the Debtors and Debtors-in-Possession